

Torres, Francine

From: jbroucek@nenb.com%inter2 [jbroucek@nenb.com] on behalf of jbroucek@nenb.com
Sent: Thursday, August 11, 2005 6:07 PM
To: National List
Subject: Sunset Review
Attachments: ATTACHMENT.TXT

Date: 8-11-05

Arthur Neal, Director, Program Administration
 National Organic Program
 USDA-AMS-TMP-NOP
 1400 Independence Ave., SW., Room 4008
 So. Ag Stop 0268
 Washington, DC 20250

Via E-mail: National.List@usda.gov
 Via Fax: (202) 205-7808

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM concerning 7 CFR Part 205, National Organic Program Sunset Review process.

New England Natural Bakers Inc. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material:

Lecithin (unbleached), as found in National List Section § 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specific ingredients or food group(s)).” This substance is used as an emulsifier in the production of organic chocolate.

New England Natural Bakers currently uses organic chocolate to produce organic Save the Forest Brand snack bars

Organic chocolate chips (made with lecithin (unbleached)) are a key ingredient in our formulation without which we would be unable to produce our organic bars.

Although we are aware that organic lecithin (unbleached) has been produced, after running tests the producer of our organic chocolate has found the quality and characteristics of that organic lecithin is not suitable. At this time there is no suitable organic alternative to the natural, non-GM lecithin (unbleached) that is currently being used. Therefore, it is essential that lecithin (unbleached) be kept on the National List Section § 205.606.

Sincerely,

John Broucek
 General Manager
 NENB Inc.

8/15/2005